

# THE VARGAS LAW FIRM

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May 29, 2024

Chief Judge Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza E Brooklyn, NY 11201

Re: **United States v. Amaury Guzman et al.**  
Dkt. #: **23 Cr. 00107**

Dear Judge Brodie:

As you are aware, I am retained Counsel for Mr. Amaury Guzman (hereinafter “Mr. Guzman”) in the above mentioned case. This letter application is respectfully submitted after consultation and consent with the government, and both co-defendant counsels David Kirby and Eylan Schulman requesting the conference of May 30<sup>th</sup>, 2024 as to the remaining defendants, Amaury Guzman, Jonathan Rodriguez, and Ruffi Fernandez be adjourned.

Defense counsel reports that the defendant is still engaged in ongoing review of the voluminous discovery provided by the Government. Defense counsel needs more time to discuss the evidence with Mr. Guzman given the hard drive was only recently given to him by the correctional authorities.

Furthermore, the Defense counsel respectfully suggests that the Court finds that time from May 30, 2024 until the next adjournment is excusable because the ends of justice is served by granting this continuance and that outweighs the best interest of the public and the defendant in speedy trial. 18 U.S.C. §§ 3161(A)-(C) AND (h)(7)(A)

Defense counsel respectfully suggests an additional time of thirty days to return to court and any other date convenient to the court in late June or early July 2024.

Thank you.

Respectfully,  
*Charlie Vargas*

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Charlie A. Vargas, Esq.